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|--------------------------|------------------------------------|------------------------|----------------------|
| SERFF Tracking Number: | UNSA-127064446 | State: | Arkansas |
| Filing Company: | USAA Direct Life Insurance Company | State Tracking Number: | 48244 |
| Company Tracking Number: | | | |
| TOI: | L08 Life - Other | Sub-TOI: | L08.000 Life - Other |
| Product Name: | Accelerated Death Benefit Rider | | |
| Project Name/Number: | Accel Death Benefit Rider/ | | |

Filing at a Glance

Company: USAA Direct Life Insurance Company

Product Name: Accelerated Death Benefit Rider SERFF Tr Num: UNSA-127064446 State: Arkansas

TOI: L08 Life - Other SERFF Status: Closed-Approved- State Tr Num: 48244
Closed

Sub-TOI: L08.000 Life - Other Co Tr Num: State Status: Approved-Closed

Filing Type: Form Reviewer(s): Linda Bird

Author: Betty Drzymalla Disposition Date: 03/17/2011

Date Submitted: 03/14/2011 Disposition Status: Approved-Closed

Implementation Date Requested:

Implementation Date:

State Filing Description:

General Information

Project Name: Accel Death Benefit Rider

Project Number:

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Individual Market Type:

Filing Status Changed: 03/17/2011

State Status Changed: 03/17/2011

Created By: Betty Drzymalla

Corresponding Filing Tracking Number:

Deemer Date:

Submitted By: Betty Drzymalla

Filing Description:

USAA DIRECT LIFE INSURANCE COMPANY

FORM FILING- LIFE INSURANCE

NAIC #200-72613

FEIN #86-0225077

ACCELERATED BENEFIT FOR TERMINAL ILLNESS RIDER

We are submitting the Accelerated Benefit for Terminal Illness Rider for review and approval. We are filing in 46 other locations including our domicile state of Nebraska. This form will be modified only to meet respective state requirements. We plan to begin using this product upon

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approval.

This benefit will be available for all life policies that were previously approved by your department. We also plan to make this rider available on any future life policies marketed by USAA Direct Life.

This rider will always be accompanied by form, DDN94910ST 03-11, the Required Disclosure Statement for Accelerated Benefits, a copy of which is enclosed for your information.

Company and Contact

Filing Contact Information

Betty Drzymalla, Compliance Analyst
9800 Fredericksburg Road
B-1-E, Operations Compliance 47195
San Antonio, TX 78288

Betty.Drzymalla@usaa.com
800-531-8000 [Phone] 89647 [Ext]
210-498-6675 [FAX]

Filing Company Information

USAA Direct Life Insurance Company
1111 North 102nd Court
Suite 288
Omaha, NE 68114
(800) 531-8722 ext. [Phone]

CoCode: 72613
Group Code: 200
Group Name:
FEIN Number: 86-0225077

State of Domicile: Nebraska
Company Type: Life
State ID Number:

Filing Fees

| | |
|------------------|-----------------------|
| Fee Required? | Yes |
| Fee Amount: | \$50.00 |
| Retaliatory? | No |
| Fee Explanation: | \$50.00 x 1 = \$50.00 |
| Per Company: | No |

| | | | |
|---------------------------------|---|-------------------------------|-----------------------------|
| <i>SERFF Tracking Number:</i> | <i>UNSA-127064446</i> | <i>State:</i> | <i>Arkansas</i> |
| <i>Filing Company:</i> | <i>USAA Direct Life Insurance Company</i> | <i>State Tracking Number:</i> | <i>48244</i> |
| <i>Company Tracking Number:</i> | | | |
| <i>TOI:</i> | <i>L08 Life - Other</i> | <i>Sub-TOI:</i> | <i>L08.000 Life - Other</i> |
| <i>Product Name:</i> | <i>Accelerated Death Benefit Rider</i> | | |
| <i>Project Name/Number:</i> | <i>Accel Death Benefit Rider/</i> | | |

| COMPANY | AMOUNT | DATE PROCESSED | TRANSACTION # |
|------------------------------------|---------|----------------|---------------|
| USAA Direct Life Insurance Company | \$50.00 | 03/14/2011 | 45559385 |

| | | | |
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| Product Name: | Accelerated Death Benefit Rider | | |
| Project Name/Number: | Accel Death Benefit Rider/ | | |

Correspondence Summary

Dispositions

| Status | Created By | Created On | Date Submitted |
|-----------------|------------|------------|----------------|
| Approved-Closed | Linda Bird | 03/17/2011 | 03/17/2011 |

| | | | |
|---------------------------------|---|-------------------------------|-----------------------------|
| <i>SERFF Tracking Number:</i> | <i>UNSA-127064446</i> | <i>State:</i> | <i>Arkansas</i> |
| <i>Filing Company:</i> | <i>USAA Direct Life Insurance Company</i> | <i>State Tracking Number:</i> | <i>48244</i> |
| <i>Company Tracking Number:</i> | | | |
| <i>TOI:</i> | <i>L08 Life - Other</i> | <i>Sub-TOI:</i> | <i>L08.000 Life - Other</i> |
| <i>Product Name:</i> | <i>Accelerated Death Benefit Rider</i> | | |
| <i>Project Name/Number:</i> | <i>Accel Death Benefit Rider/</i> | | |

Disposition

Disposition Date: 03/17/2011

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

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| Schedule | Schedule Item | Schedule Item Status | Public Access |
|---------------------|--|----------------------|---------------|
| Supporting Document | Flesch Certification | | Yes |
| Supporting Document | Application | | No |
| Supporting Document | Actuarial Memorandum | | No |
| Supporting Document | REQUIRED DISCLOSURE FOR ACCELERATED DEATH BENEFIT | | Yes |
| Form | Accel Bft for Terminal Illness Rider | | Yes |

| | | | |
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Form Schedule

Lead Form Number: DBR94896ST 03-11

| Schedule Item Status | Form Number | Form Type | Form Name | Action | Action Specific Data | Readability | Attachment |
|----------------------|-------------------|--|--|--------|----------------------|-------------|--------------------|
| | DBR94896 ST 03-11 | Certificate Amendmen t, Insert Page, Endorseme nt or Rider | Accel Bft for Termina lInitial Illness Rider | | | 44.000 | DBR94896 03-11.pdf |



Service Center
9800 Fredericksburg Road
San Antonio, Texas 78288

USAA DIRECT LIFE INSURANCE COMPANY

ACCELERATED BENEFIT FOR TERMINAL ILLNESS RIDER

This rider is part of the policy to which it is attached. This rider will not increase guaranteed policy values, if any. Except as stated in this rider, all other policy provisions apply.

Notice

DEATH BENEFITS AND ANY AVAILABLE LOAN VALUES WILL BE REDUCED IF AN ACCELERATED BENEFIT IS PAID. The Accelerated Benefit provided by this rider may or may not qualify for favorable tax treatment under the United States Internal Revenue Code. Whether the Accelerated Benefit qualifies depends on factors such as your life expectancy at the time you request the benefit. If the Accelerated Benefit qualifies for favorable tax treatment, the benefit will be excludable from your income and not subject to federal income taxation. Tax laws relating to these benefits are complex. We advise you to consult with a qualified tax advisor about the circumstances under which you could receive the Accelerated Benefit excludable from income under federal law before requesting benefits under this rider.

Definitions

Premium. The premium for the life insurance policy, including any riders attached to the policy. For universal life insurance policies (known as flexible premium adjustable death benefit life insurance in some states), Premium refers to the Monthly Deduction.

Terminal Illness. An illness or physical condition which is reasonably expected to result in the Insured's death within 12 months or less after the Owner's request for payment of an Accelerated Benefit under this rider.

Accelerated Benefit

You may request that the Company make an accelerated benefit payment if the Insured has a Terminal Illness prior to the Maturity Date of the policy, subject to the conditions stated in this rider. You are responsible for any and all tax consequences which may result from the payment of the Accelerated Benefit.

The maximum Accelerated Benefit that will be paid is the lesser of

1. One half of the current Death Benefit of the policy, excluding any additional benefits provided by rider; or
2. \$250,000.

You may elect to receive the Accelerated Benefit in a lump sum or under a settlement option.

Conditions

The Company will pay an Accelerated Benefit subject to these conditions:

1. The policy and this rider must be in force when you request the Accelerated Benefit.
2. You must request payment of the Accelerated Benefit in writing prior to the Maturity Date and the written request must be received at our Home Office.
3. You must provide proof satisfactory to the Company that the Insured has a Terminal Illness.
4. Any irrevocable beneficiary and any assignee of record must agree in writing to the payment of the Accelerated Benefit.
5. The Accelerated Benefit will be used first to repay any outstanding policy loans and unpaid accrued loan interest.

If any of the above conditions are not met, we will not pay the Accelerated Benefit.

Proof of Terminal Illness

We will require you to provide proof satisfactory to the Company of the Insured's Terminal Illness from a licensed physician who is not the Owner, Insured, or a member of either's family. This proof must describe the Insured's illness or physical condition and certify that it is a Terminal Illness as defined in this rider.

We reserve the right to obtain additional medical diagnoses or documentation to establish eligibility for the Accelerated Benefit. This may include an additional written medical opinion. Such additional diagnoses are at the expense of the Company and any conflicting diagnoses will be reconciled by the Company's Medical Director, who will make a determination of Terminal Illness from all information provided.

USAA DIRECT LIFE INSURANCE COMPANY [1111 North 102nd Court, Suite 228, Omaha, NE 68114]

Effect of the Accelerated Benefit on the Policy

The Accelerated Benefit payment will be treated as a lien against the policy. Any Death Benefit which becomes payable will be reduced by the amount of this lien and the amount of any policy loans and accrued interest. Upon payment of any remaining Death Benefit, all our obligations under the policy will terminate.

We will send you a statement describing the Accelerated Benefit paid and the effects it may have on the policy. Any periodic statements and policy endorsements will reflect the amount of the reduction in values and benefits. Your access to any remaining policy values through loans, withdrawals, or surrenders in accordance with the terms of the policy, will be limited to any excess of the policy values over the sum of the lien arising from payment of the Accelerated Benefit and any other outstanding policy loans plus accrued interest.

There is no charge for this rider. However, you must continue to pay all required Premiums after payment of an Accelerated Benefit. If a Premium is not paid when due, we will pay the Premium on behalf of the Owner and add that amount to the lien resulting from the Accelerated Benefit payment to be deducted from the Death Benefit. If the amount of the Accelerated Benefit and unpaid Premiums ever exceeds the Death Benefit, then the policy will terminate and no additional benefits will be payable.

Interest

We will charge interest on the amount of the Accelerated Benefit paid and on any Premium paid by the Company. Interest will accrue daily until the Insured's death. If the policy provides for loans, the interest rate will be the policy loan interest rate stated in the policy.

If the policy does not provide for loans, the interest rate will be the published monthly average of Moody's Corporate Bond Yield, as published by Moody's Investor Service Inc., for the calendar month ending two months before the date on which we pay the Accelerated Benefit. The interest rate will not be greater than the maximum rate permitted by the laws of the state where the policy was issued. If the Moody's Corporate Bond Yield Average is discontinued, we may substitute another method of determining the interest rate that is permitted by the laws of the state where the policy was issued.

General Provisions

This rider provides for the early, partial payment of the Death Benefit. It is not meant to cause the Owner to involuntarily access proceeds intended for payment to the beneficiary. Therefore, the Owner is not eligible to receive an Accelerated Benefit if:

1. The Owner is required by law to use this benefit to meet the claims of creditors, whether in bankruptcy or otherwise; or
2. The Owner is required by a government agency to use this benefit in order to apply for, obtain, or otherwise keep a government benefit or entitlement.

Nonparticipating

Dividends are not payable in connection with this rider.

Rider Termination

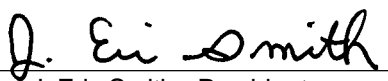
This rider will end at the earliest of the following events:

1. The policy terminates.
2. Election or implementation of any of the policy's nonforfeiture benefits.
3. Your written request to terminate this rider.

Effective Date of this Rider if other than the effective date of the policy: _____.

Signed for the Company.

USAA DIRECT LIFE INSURANCE COMPANY


J. Eric Smith - President

| | | | |
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Supporting Document Schedules

| | | |
|--|----------------------|---------------|
| | Item Status: | Status |
| | | Date: |
| Satisfied - Item: | Flesch Certification | |
| Comments: | | |
| Attachments: | | |
| ARKANSAS CERTIFICATE OF COMPLIANCE.pdf | | |
| CERTIFICATE OF READABILITY.pdf | | |

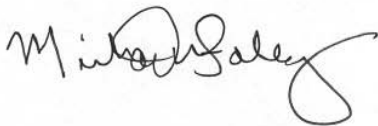
| | | |
|--------------------------|--|---------------|
| | Item Status: | Status |
| | | Date: |
| Satisfied - Item: | REQUIRED DISCLOSURE FOR ACCELERATED DEATH BENEFIT | |
| Comments: | | |
| Attachment: | | |
| DDN94910ST 03-11.pdf | | |

USAA Direct Life Insurance Company

CERTIFICATION

DATE: March 14, 2011

This is to certify that the attached Form Number Dbr94896st 03-11, to the best of our knowledge, complies with the Arkansas Rule and Regulation 19 – Unfair Sex Discrimination in the sale of insurance.

A handwritten signature in black ink, appearing to read "Michael Foley". The signature is fluid and cursive, with the first name "Michael" and last name "Foley" clearly distinguishable.

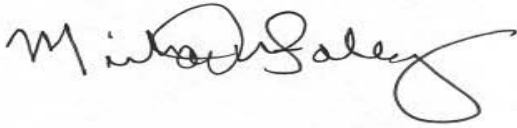
Michael Foley
Asst Vice President
USAA DIRECT LIFE INSURANCE COMPANY

CERTIFICATE OF READABILITY

| FORM NAME | FORM NUMBER | FLESH SCORE |
|--|------------------|-------------|
| Accelerated Benefit for Terminal Illness Rider | DBR94896ST 03-11 | 44 |
| | | |
| | | |
| | | |

The print is ten point type, one point leaded.

I certify that to the best of my knowledge and belief, the above referenced forms meet or exceed the readability, legibility, and format requirements of any applicable laws and regulations.

A handwritten signature in black ink, appearing to read "Michael Galey". The signature is fluid and cursive, with a large loop at the end.

Assistant Vice President
USAA Direct Life Insurance Company



Service Center
9800 Fredericksburg Road
San Antonio, Texas 78288

USAA DIRECT LIFE INSURANCE COMPANY

REQUIRED DISCLOSURE STATEMENT FOR ACCELERATED BENEFITS

- A. Accelerating Condition: Illness or physical condition that reduces the insured's life expectancy to 12 months or less.
- B. Accelerating Options: You may accelerate up to 50% of the current death benefit, or \$250,000, whichever amount is lower.
- C. Premium for Accelerated Benefit: None.
- D. Administrative Expense Charge: None.
- E. Impact on Policy Values: **DEATH BENEFITS, AND ANY AVAILABLE LOAN VALUES WILL BE REDUCED IF AN ACCELERATED BENEFIT IS PAID.** The effect of an accelerated benefit on the policy is described below:
- (1) Policy Face Amount: Remains the same.
 - (2) Amount to be Accelerated: Lesser of \$250,000 or 50% of the face amount.
 - (3) Interest Rate: No more than 7.4% per year payable in advance. Interest on the accelerated benefit payment will accrue daily from the date of payment until the insured's death.
 - (4) Premium Necessary to Keep Policy in Force: Remains the same. Unpaid premiums will be added to the accelerated benefit amount and will accrue interest. This will further reduce the amount of the death benefit at the insured's death.
 - (5) Policy Liens: The accelerated benefit payment, plus accrued interest and unpaid premiums, will be treated as a lien against the death benefit and will reduce the amount payable to the beneficiary at the insured's death. Coverage will terminate if the amount of the accelerated benefit, plus accrued interest and unpaid premiums, equals or exceeds the face amount of the policy.
- F. Limitations of the Accelerated Benefit:
- (1) This accelerated benefit provision is NOT a long-term care policy or a nursing home insurance policy. The amount this provision pays you may not be enough to cover your medical, nursing home, or other bills. You may use the money you receive from this provision for any purpose.
 - (2) Unlike conventional life insurance proceeds, accelerated benefits payable under this product MAY BE TAXABLE. Whether the benefits qualify for favorable tax treatment depends on factors such as your life expectancy at the time benefits are accelerated or whether to use the benefits to pay for necessary long-term care expenses, such as nursing home care. If the accelerated benefits qualify for favorable tax treatment, the benefits could be excluded from your income and not subject to federal taxation. Tax laws relating to accelerated benefits are complex. We cannot give you advice about this. You may wish to obtain tax advice from a tax professional or an attorney before you decide to receive accelerated benefits from a life insurance policy.
 - (3) Receipt of accelerated benefits under this provision MAY AFFECT MEDICAID and SUPPLEMENTAL SECURITY INCOME ("SSI") eligibility for you, your spouse, or your family. If you receive payment of accelerated benefits from a life insurance policy, you may lose your right to receive these public funds, as well as Medicaid, Social Security, Aid to Families with Dependent Children (AFDC), drug assistance programs, and possibly others. Without exercising your option to accelerate benefits, the mere fact that you own an accelerated benefit product will not in and of itself affect your eligibility for these government programs. However, exercising your option to accelerate benefits and receiving those benefits before you apply for these programs, or while you are receiving government benefits, may affect your initial or continued eligibility. You should consult with a qualified tax advisor and your local Medicaid and Social Security Administration offices for more information.

USAA DIRECT LIFE INSURANCE COMPANY [1111 North 102nd Court, Suite 228, Omaha, NE 68114]